

FEDERAL ELECTION COMMISSION Washington DC 20463

THIS IS THE BEGINN	<u>IING</u> OF ADMINI	ISTRATIVE FINE CASE #	9
DATE SCANNED	8/19/15		
SCANNER NO.			
SCAN OPERATOR	TB		



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

00.44 (135) 00.44 (135) 00.74 (134)

2015 APR -1 PK 5: 20

April 1, 2015

SENSITIVE

MEMORANDUM

TO:

The Commission

THROUGH:

Alec Palmer A

Staff Director

FROM:

Patricia C. Orrock

Chief Compliance Officer

Debbie Chacona

Assistant Staff Director
Reports Analysis Division

Reports Analysis Division

BY:

Kristin D. Roser/Sari Pickerall

Reports Analysis Division

Compliance Branch

SUBJECT:

Reason To Believe Recommendation – 2014 Year-End Report for the

Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2014 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2015.

The committees listed in the attached RTB Circulation Report either failed to file the report,

no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

- 1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- 2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2014 YEAR-END Not Election Sensitive 01/31/2015 H_S_P_UNAUTH

_	•	_	
RTB Penalty		\$13.200	\$1,090
FOA		\$993 529 (est)	\$32,581 (est)
Days Late		Not Filed	Not Filed
Receipt Date Days Late			;
3		 0	0
Threshold		\$2.980.5861	\$228,068
Treasurer		11 OYD HFTZFR \$2.980.586	CAROL RUSSELL
Candidate Name		FIINN GFORGE SHFA	
Committee Name		FLINN FOR SFNATE	IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS
Committee		2969 C00561688	2971 C00559054
AF#		1 2969	2971

1/1/2015 4:56 PM	RTB Penalty	
4/1/201	FOA	
	Days Late	
ļ	Receipt Date (
	Ad Plot	
	Threshol	
	Treasurer	
	Candidate Name	•
	Committee Name	

AF# Committee ID

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
Reason To Believe Recommendation - 2014 Year-End Report of the Administrative Fine)
Program:	j

15092705403

FLINN FOR SENATE, and LLOYD HETZER as treasurer;)	AF# 2969
IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS, and CAROL RUSSELL as treasurer:)	AF# 2971

CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission, do hereby certify that on April 03, 2015 the Commission took the following actions on the Reason To Believe Recommendation - 2014 Year-End Report of the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 01, 2015, on the following committees:

AF#2969 Decided by a vote of 6-0 to: (1) find reason to believe that FLINN FOR SENATE, and LLOYD HETZER as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2971 Decided by a vote of 6-0 to: (1) find reason to believe that IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS, and CAROL RUSSELL as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

15092705412

Attest:

Shelley E. Garr

Deputy Secretary of the Commission



April 6, 2015

Lloyd Hetzer, in official capacity as Treasurer Flinn for Senate 776 Mount Moriah Road Memphis, TN 38117

C00561688 AF#: 2969

Dear Mr. Hetzer:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period October 1, 2014 through December 31, 2014, was due no later than January 31, 2015. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 3, 2015, the FEC found that there is reason to believe ("RTB") that Flinn for Senate and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before January 31, 2015 Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$13,200. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See http://www.fec.gov/af/af.shtml. 11 CFR § 111.34. Your payment of \$13,200 is due within forty (40) days of the finding, or by May 13, 2015, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$993,529 Number of Days Late: Not Filed

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1

under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 13, 2015. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Flinn for Senate and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at http://www.fec.gov/af/af.shtml. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Ravel

Ann M. Ravel

Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$13,200 for the 2014 Year-End Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Pederal Election Commission P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

The remittance and your payment are due by May 13, 2015. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Flinn for Senate

FEC ID#: C00561688

AF#: 2969

PAYMENT DUE DATE: May 13, 2015

PAYMENT AMOUNT DUE: \$13,200



FEC OFFICE CEADMIN REVIEW

2015 MAY -1 AM 7: 42

776 Mount Moriah Road Memphis, Tennessee 38117

April 28, 2015

Ann M. Ravel, Chair Federal Election Commission Office of Administrative Review 999 E Street NW Washington, DC 20463

C00561688 AF#: 2969

Dear Ms. Ravel

In a letter dated April 6, 2015 the Federal Election Commission notified the Flinn for Senate Committee of a civil money penalty in the amount of \$13,200 for failure to file a required report in a timely manner. The report is the Year End Report covering October 1, 2014 through December 31, 2014. In accordance with your letter the Committee has a number of actions available, including a Challenge to the RTB Finding and/or the Civil Money Penalty.

The Flinn for Senate Committee does hereby challenge the RTB Finding and the Civil Money Penalty as our records indicate that said report was filed in a timely manner. Our records indicate that the report was signed by the Treasurer and mailed on January 15, 2015 well in advance of the January 31, 2015 deadline. Attached is an affidavit from the campaign staff person responsible for the preparation of the report along with a copy of the report as prepared and signed by the Treasurer.

Also enclosed is a copy of an amended year-end report recently filed when disbursements and receipts were discovered to have been made to the Flinn for Senate bank account and not reflected in the original year-end report. Finally, there is also a copy of our termination report, filed April 15, 2015 showing the closure of accounts and disposition of loans to the Committee.

I do hope this will resolve the situation. It was certainly not the intent of the Committee, its Treasurer or staff to fail to comply with Federal law and regulations. The Committee and Treasurer has completed all other filings in a timely manner and made necessary amendments as requested by the Federal Election Commission during the time of the existence of the Committee.

Sincerely,

George S. Flinn, Jr.

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Deborch Jean Malme

Telephone

TENNESSEE

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Expires - 418/18

AFFIDAVIT OF EUGENE S. BRYAN

Preparation and Submittal of Report of Receipts and Disbursements Flinn for Senate Committee C00561688

October 1, 2014 to December 31, 2014 - Year End Report

I, Eugene Bryan, a member of the campaign staff of the Flinn for Senate Committee was responsible for the following activities:

- Preparation of the Federal Year End Financial Disclosure Report covering the period of October 1, 2014 to December 31, 2014, due the Secretary of the Senate on or before January 31, 2015
- Review the Year End Report with and obtain the signature of the Treasurer of the Flinn for Senate Campaign Committee
- Mailing the Year-end Report to the Secretary of the Senate before January 31, 2015.

The Year-end Report was prepared on or about January 13, 2015 and reviewed and signed by the Treasurer on January 15, 2015.

The Year-end Report was mailed on Thursday January 15, 2015 by prepaid First Class Postage to the following address:

Secretary of the Senate Office of Public Records P.O. Box 77578 Washington, DC 20013-7578

The report was sent First Class Postage because there was sufficient time for delivery, 16 days before the deadline. The package was not returned to the Flinn for Senate Committee, and was therefore believed to have been received in a timely manner.

Eugene S. Bryan

Debood Jean Molone

The State Market Market

Expires 4/8/18

15092705419

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

FURM 3	For. An	Authorized Com	mittee	Office Use Only	
NAME OF COMMITTEE (in full)	TYPE OR PRIN		ample: If typing, type er the lines.		
LINN Far	Sanati	<u>G</u>			
<u> </u>	<u> </u>				
DDRESS (number and street)	776 1	nount 1	Moniah K	थ दर्व	
Check if different					
than previously reported. (ACC)	Menfi	615	<u></u>	DIN E	38717-
FEC IDENTIFICATION	MIMPED W	CITY A		STATE A	ZIP CODE A
C 00561		3. IS THIS REPORT	X NEW (N) OR	AMEND (A)	STATE ▼ DISTRIC
TYPE OF REPORT	(Choose One)	(b) 12-Day PRE	-Election Report for t	he:	<u></u>
(a) Quarterly Reports:			Primary (12P)	General (1	12G) Runoff (12R)
April 15 Quarte	rly Report (Q1)		Convention (12C)	Special (1	25)
July 15 Quarter	ty Report (Q2)				
October 15 Qu	arterly Report (Q3)	Election on	M M / D C	, , , , , ,	in the State of
January 31 Yea	r-End Report (YE)	(c) 30-Day POS	T-Election Report for	the:	
•			General (30G)	Runoff (30	DR) Special (30S
Termination Rep	oort (TER)	Election on			in the State of
Covering Period ertify that I have examine	· · · · · · · · · · · · · · · · · · ·		through		
pe or Print Name of Treas		OYA HETZ		· · · · · · · · · · · · · · · · · · ·	
gnature of Treasurer	tolde			Date B	1.13 2010
	roneous, or incomp	lete information may	subject the person sign	ning this Report to the	he penalties of 52 U.S.C. §301
Office Use Only					FEC FORM 3 (Revised 02/2003)

FEC Form 3 (Revised 02/2003)

SUMMARY PAGE
of Receipts and Disbursements

Page 2

Write or Type Committee Name

Report Covering the Period:

From:

10 01 2014

To: 12/31/2014

				LUMN /			LUMN B Cycle-to-Date
6.	Net Contributions (other than loans)						
	(a) Total Contributions (other than loans) (from Line 11(e))	,	:		0.00	•	242495
	(b) Total Contribution Refunds (from Line 20(d))	,	· . ·		000		, 0.00
	(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))		-	. •	000	ing section of the se	9,424.95
7.	Net Operating Expenditures			•			
	(a) Total Operating Expenditures (from Line 17)		· .	4,8	07.87	1,13	50.721.77
	(b) Total Offsets to Operating Expenditures (from Line 14)	9			000	9.	, 0 00
	(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))		· ·.	4,8	07.87	1,1	50,721.77
8.	Cash on Hand at Close of Reporting Period (from Line 27)		64	3,9	53.18		·
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		· .	3	000		
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	, , , , , , , , , , , , , , , , , , ,	80	<i>چر</i> ,ک	50.00		

For further information contact:

Federal Election Commission 999 E Street, NW Washington, DC 20463

Toll Free 800-424-9530 Local 202-694-1100

FESAN018

DETAILED SUMMARY PAGE

of Receipts

Page 3

FEC Form 3 (Revised 12/2003)
Write or Type Committee Name

Report Covering the Period:

From:

To:

I. RECEIPTS		COLUMN Total This P		COLUMN B Election Cycle-to-Date	
11.	CONTRIBUTIONS (other than loans) FROM:			•	
	(a) Individuals/Persons Other Than				
	Political Committees (i) Itemized (use Schedule A)	3 3	000	7.000.00	
	(ii) Uniternized	,	000	, 2424.95	
	(iii) TOTAL of contributions from Individuals	5 5	000	9,424.95	
	(b) Political Party Committees	3	0.00	, , , , ,	
	(c) Other Political Committees (such as PACs)	5 . 3°	000	, , , 000	
	(d) The Candidate (e) TOTAL CONTRIBUTIONS		0.00	, , , , ,	
	(other than loans) (add Lines 11(a)(iii), (b), (c), and (d))	3 5	0.00	, 9,424.95	
12.	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		000	, , <i>co</i> o	
13.	LOANS:			•	
	(a) Made or Guaranteed by the Candidate		000	1,805,250.00	
	(b) All Other Loans	5 5	000	,	
	(c) TOTAL LOANS (add Lines 13(a) and (b))	.	000	1,805,250.00	
14.	OFFSETS TO OPERATING				
	EXPENDITURES (Refunds, Rebates, etc.)	,	000	, , , 0.0 0	
15.	OTHER RECEIPTS (Dividends, Interest, etc.)	3 1	0.0 0	, , <i>0.0 0</i>	
16.	TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)	**************************************	0.00	1,814,674.95	

DETAILED SUMMARY PAGE

Page 4

FEC Form 3 (Revised 02/2003) of Disbursements

II. DISBURSEMENTS		COLUMN A Total This Period	COLUMN B Election Cycle-to-Date	
17.	OPERATING EXPENDITURES	, 4807.87	1,150,721.77	
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	, , O.O V	, 20,000.00	
19.	LOAN REPAYMENTS: (a) Of Loans Made or Guaranteed by the Candidate	, , 00 6	, , , , , , , , , , , , , , , , , , , ,	
	(b) Of All Other Loans	, , 000	, , 0.00 , , 0.00	
20.	REFUNDS OF CONTRIBUTIONS TO: (a) Individuals/Persons Other Than Political Committees	, , 0.0 0	, , 000 , , 000	
	(c) Other Political Committees (such as PACs)	, , 0.0 0	, , 0.00	
	(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c))	, , , 006	, 0.00	
21.	OTHER DISBURSEMENTS	, , , , , , , , , , , , , , , , , , , ,	, , 000	
22.	TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21)	, 4807.87	1,170,721.77	
	III. CASH SI	UMMARY		
23.	CASH ON HAND AT BEGINNING OF REPO	PATING PERIOD	,648,761.05	
24	TOTAL RECEIPTS THIS PERIOD (from Line	16, page 3)	, , 0.00	
25.	SUBTOTAL (add Line 23 and Line 24)	,648,761.05		
26.	TOTAL DISBURSEMENTS THIS PERIOD (fre	, 4807.87		
25. SUBTOTAL (add Line 23 and Line 24)			,643,953.18	
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SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE OF Check only one) X 17
Any information copied from such Reports and Statements mor for commercial purposes, other than using the name and a NAME OF COMMITTEE (in Full) FIAN For SenaTe	address of any political committ	person for the purpose of soliciting contributions
Full Name (Last, First, Middle Initial) A. Vaicen T Communic Mailing Address Titler Net California		Date of Disbursement Disbursement 2015/ Amount of Each Disbursement this Period
Purpose of Disbursement Candidate Name CEOPE FINA Office Sought: House Disbursement For Senate Primary President Other (s	Category, Type	
Full Name (Last, First, Middle Initial) B. Eugewe Bryan Mailing Address 5923 Hickory Trei City Memphis Purpose of Disbursement	Zip Code 380/8 Category Type T: General	Date of Disbursement Amount of Each Disbursement this Period
State: District: Ample Full Name (Last, First, Middle Initial) C. Sew Synthemia Mailing Address State City City State Purpose of Disbursement Candidate Name Candidate Name Disbursement Senate Primary President Cother (s	Ip Code 38 0/8 Category Type Type	Date of Disbursement Amount of Each Disbursement this Period
SUBTOTAL of Disbursements This Page (optional)		

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SCHEDULE B (FEC Form 3)	Use separate schedule(s)	FOR LINE NUMBER: PAGE OF (check only one)		
ITEMIZED DISBURSEMENTS	for each category of the	77 18 198 198		
	Detailed Summary Page	20a 20b 20c 21		
Any information copied from such Reports and Statements m or for commercial purposes, other than using the name and a				
NAME OF COMMITTEE (In Full)				
/ Fling for Senate	•			
Full Name (Last, First, Middle Initial)		Date of Disbursement		
A Federal Express		1		
Mailing Address PoPlar Avene		10 15 2014		
City Men Phis In	Zip Code 38/17	Amount of Each Disbursement this Period		
Purpose of Disbursement Exercise Postage of	00	, , 937		
Candidate Name Leange Flinin	Category, Type	·		
Office Sought: House Disbursement For		-		
Senate Primary President Cother (s	specify)	1		
State: District: CAM	PEIGN CLOSEON	<u> </u>		
Full Name (Last, First, Middle Initial)		Date of Disbursement		
B. Fed Ex				
Mailing Address 5.64		ブン' パラ' えど リチ		
City Barylatt Tax	Zip Code 38/34	Amount of Each Disbursement this Period		
Purpose of Disbursement Express Postage for Re	PorTS	, , 39.50		
Candidate Name	Category	;		
Office Sought: House Disbursement For	Туре	<u>-</u>		
Senate Primary	 '	1		
President Other (s	specify)	٠ ا ـ		
	gn Closeovi			
Full Name (Last, First, Middle Initial) C. Z		Date of Disbursement		
COLENE DIABLE		M, M / D D / Y Y Y		
Mailing Address Hickory Trail	, :	10 01 2014		
City State Zi	p Code 58018	Amount of Each Disbursement this Period		
Purpose of Disbursement	3000	150000		
Candidate Name		The second secon		
George Flinn	Category Type	′		
Office Sought: House Disbursement For		7		
Senate Primary President Other (s	لبييا			
State: District: CAMP 21	gn Closeovi	-		
SUBTOTAL of Disbursements This Page (optional),				
TOTAL This Period (last page this line number only)		, ,		

SCHEDULE B (FEC Form 3) TEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 3 OF 3 (check only one) 17 18 19a 19b 20a 20b 20c 21
Any information copied from such Reports and Statements ror for commercial purposes, other than using the name and	nay not be sold or used by any address of any political committ	person for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full) Fling For Sonate	,	
Full Name (Last, First, Middle Initial)		Date of Disbursement
Eugene BryAn		12 26 2014
Mailing Address Hickory Trail		12 26 2014
City Cordova State	Zip Code J80/8	Amount of Each Disbursement this Period
Purpose of Disbursement		1200.00
Candidate Name	Category	<i>;</i>
Office Sought: House Disbursement Fo	r:	-
Senate Primar	y General	
State: District: Other	(specify) - Close OC	7
Full Name (Last, First, Middle Initial)		
В.		Date of Disbursement
Mailing Address		M M / O O / Y Y Y
City State	Amount of Each Disbursement this Period	
Purpose of Disbursement		
Candidate Name	,	
State: District:		
Full Name (Last, First, Middle Initial) C.		Date of Disbursement
		M 'M / D O / V V V
Mailing Address		The state of the second
City State 2	Zip Code	Amount of Each Disbursement this Period
Purpose of Disbursement		· · · · · · · · · · · · · · · · · · ·
Candidate Name Category/		
Office Sought: House Disbursement For Senate Primar President Other State: District:	~ <u> </u>	
		
SUBTOTAL of Disbursements This Page (optional)		
TOTAL This Period (last page this line number only)		The state of the s

SCHEDULE C (FEC Form 3) LOANS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)

PAGE

13a

OF /

		Detailed Summary Pag	ge 13b	
AME OF COMMITTEE (In Full))			
Flinn to	r Senate			
LOAN SOURCE Full Name	(Last, First, Middle Initial)	:	Election:	
Fling, C	George S. J.	·	Primary General	
I Maliina Address	Goodwyn		Other (specify)	
Ony .	·	Code		
MemPhis	TN	38/11		
Original Amount of Loan	Cumulative Paymen	•	ance Outstanding at Close of This Period	
1,805,3	250.00	, 000	1.805,250.00	
TERMS Date Incurred				
04 25 8	2014 01 31	2015	OOO% (apr)	
<u> </u>	rantors (if any) to Loan Source			
1. Full Name (Last, First, N	Middle Initial)	Name of Employer		
Mailing Address		Occupation		
	· · ·	Amount		
City	State ZIP Code	Guaranteed Outstanding:	y	
2. Full Name (Last, First, M	liddle Initial)	Name of Employer		
Mailing Address		Occupation		
O'the		Amount Guaranteed		
City	State ZIP Code	Outstanding:	j , , , , , , , , , , , , , , , , , , ,	
3. Full Name (Last, First, M	liddle Initial)	Name of Employer		
Mailing Address		Occupation		
City	State ZIP Code	Amount Guaranteed		
		Outstanding:	y 9 e	
4. Full Name (Last, First, M	liddle Initial)	Name of Employer		
Mailing Address		Occupation		
84	Oh-J-	Amount		
City	State ZIP Code	Guaranteed Outstanding:	gg	
SUBTOTALS This Period This Page (optional)				
FOTALS This Period (last pag	e in this line only)		9 00 € 100 € 100	
Carry outstanding balance on	nly to LINE 3, Schedule D, for this line	e. If no Schedule D, carry for	ward to appropriate line of Summary.	

FEC FORM 3Z (File with Form 3)

CONSOLIDATION REPORT OF RECEIPTS AND DISBURSEMENTS

(To Be Used By A Principal Campaign Committee)

l	Name of Principal Campaign Committee (In Full) Report Covering Period: From: 1 To:						
	Flinn for Senate 10 01 2014 12 31 2014						
1	Plan For Senate						
	(a) (b) Line No. 11(a) Line No. 11(b) Total Contributions From Political Party Political Committees (a) (b) Line No. 11(a) Total Contributions From Political Party Political Committees Committees						
Δ						0	0
В	Ç¢	olumn Total Last Page O	nly			9424.95	0
		(c) Line No. 11(c) Total Contributions From Other Political Committees	(d) Line No. 11(d) Total Contributions From The Candidate	(e) Line No. 11(e) Total Contributions	(f) Line No. 12 Total Transfers From Other Authorized Committees	(g) Line No. 13(a) Total Loans Made or Guaranteed by the Candidate	(h) Line No. 13(b) Total All Other Loans
	A	Ø	0	0	0	. 0	0
	в	0	0	9424.95	U	1805,750,00	O
		(i) Line No. 13(c) Total Loans	(i) Line No. 14 Total Offsets to Operating Expenditures	(k) Line No. 15 Total Other Receipts	(l) Line No. 16 Total Receipts	(m) Line No. 17 Total Operating Expenditures	(n) Line No. 18 Total Transfers to Other Authorized Committees
	A	0	0	0	0	4.807.87	a 0
	в	1.805.250.00	0	0	1,814,674.95	1,150 721.77	20,000.00
		(o) Line No. 19(a) Total Loan Repayments of Loans Made or Guaranteed by The Can- didate	(p) Line No. 19(b) Total Loan Repayments of All Other Loans	(q) Line No. 19(c) Total Loan Repayments	(r) Line No. 20(a) Total Contribution Refunds to Individuals/Persons	(s) Line No. 20(b) Total Contribution Refunds to Political Party Committees	(t) Line No. 20(c) Total Contribution Refunds to Other Political Committees
	A	ಲ	0	O	ව	0	ð
	В	O	0	0	U	J	0
		(u) Line No. 20(d) Total Contribution Refunds	(v) Line No. 21 Total Other Disbursements	(w) Line No. 22 Total Disbursements	(x) Line No. 23 Cash on Hand Beginning of Reporting Period	(y) Line No. 27 Cash on Hand Close of Reporting Period	(z) Line No. 9 Debts & Obligations Owed TO the Committee
	Α	ಲ	0	4807.87	648,761.05	643,953.18	. 0
ļ	В	0	0	1.170.721.77	648.76/05	643,953.18	0
		(aa) Line No. 10 Debts & Obligations Owed BY the Committee	(bb) Line No. 6(c) Net Contributions	(cc) Line No. 7(c) Net Operating Expenditures		·	
	A	1805,250.06	900.0	4807.87			
	В	1.805,250,00	9424.95	1,150,701.77			<u> </u>

15092705428

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

FUNIVI 3	For An Aut	horized Com	nittee	·		Office Use Only
. NAME OF COMMITTEE (in full)	TYPE OR PRINT		mple: If typing, to the lines.	ype	12FE4M5	
Flinn Far	SevaTe					
				للبا	<u> </u>	
DDRESS (number and street	, 1776 M	uunt l	uniah	Roz	dun	
▼ Check if different	سنسسا			أسلسلط	111.	
than previously reported. (ACC)	Menthis	• - - - - - -		<u>.</u>	TAY 3	8117-
FEC IDENTIFICATION	N NUMBER ♥	CITY A		ST	TATE A	ZIP CODE A
°C' 00561	688	3. IS THIS REPORT	NEW (N)	or ?	AMENDE (A)	STATE V DISTRICT
. TYPE OF REPORT	(Choose One)	h) 12 Dev BBE	Floation Donat i			
(a) Quarterly Reports:		b) 12-Day PRE-	Election Report	or the:		
April 15 Quart	erly Report (Q1)		Primary (12P)	·	General (12	Runoff (12R)
			Convention (120	;)	Special (12	S)
July 15 Quarte	erly Report (Q2)		M M /) D /		in the
October 15 Qu	uarterly Report (Q3)	Election on			• • •	State of
January 31 Ye	ar-End Report (YE)	c) 30-Day POS		for the:		
		. •	General (30G)		Runoff (30F	Special (30S)
Termination Re	eport (TER)	Election on	M M /	/ و د	v v v v	in the State of
Covering Period certify that I have examine type or Print Name of Treat		· · · · · · · · · · · · · · · · · · ·	_			ZOJ4 complete.
signature of Treasurer	KAL.			Da	ate OA	14 2015
OTE: Submission of false,	erroneous, or incomplete	information may	subject the persor	signing th	is Report to the	e penalties of 52 U.S.C. §3010
Office Use Only						FEC FORM 3 (Revised 02/2003)

SUMMARY PAGE

of Receipts and Disbursements

Page 2

FEC Form 3 (Revised 02/2003)

Schedule C and/or Schedule D).....

Schedule C and/or Schedule D)

 Debts and Obligations Owed BY the Committee (Itemize all on

Write or Type Committee Name For SONATE Report Covering the Period: From: . To: **COLUMN A** This Period Net Contributions (other than loans) (a) Total Contributions (other than loans) (from Line 11(e)) (b) Total Contribution Refunds C.O B (from Line 20(d)) (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))..... Net Operating Expenditures (a) Total Operating Expenditures 5.089.00 (from Line 17) (b) Total Offsets to Operating 000 Expenditures (from Line 14)..... (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) Cash on Hand at Close of Reporting Period (from Line 27)..... Debts and Obligations Owed TO the Committee (Itemize all on

COLUMN B
Election Cycle-to-Date

, 9697.89
, 000
, 9697.89

/#5/,002.90
, 0.00

For further information contact:

1.805.250.00

Federal Election Commission 999 E Street, NW Washington, DC 20463

Toll Free 800-424-9530 Local 202-694-1100

DETAILED SUMMARY PAGE

of Receipts

FEC Form 3 (Revised 12/2003)

pts

Write or Type Committee Name

Flinn For SeNATE

Report Covering the Period:

From:

1001 8014

To: / 3 / 3 / 20/4

Page 3

I. RECEIPTS 11. CONTRIBUTIONS (other than loans) FROM:		COLUMN A Total This Period	COLUMN B Election Cycle-to-Date	
	(a) Individuals/Persons Other Than Political Committees			
	(i) Itemized (use Schedule A)	, ,272.94	, 7.272.94	
	(ii) Uniternized	277 000	2424.95	
	Irom Individuals	, ,272.94	, 9,6 97.89	
	(b) Political Party Committees	, , 0.00	, , , <i>U.O 6</i>	
	(such as PACs)	, , , , , , , , , , , , , , , , , ,	, , <i>O</i> , o o	
	(d) The Candidate	, , 000	, , , , , , , , , , , , , , , , , , , ,	
	(other than loans) (add Lines 11(a)(iii), (b), (c), and (d))	, ,272.94	9,69789	
12.	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	, , છ૦૦	, , 000	
13.	LOANS:	·	•	
	(a) Made or Guaranteed by the Candidate	, , , 00€	1,805,250.00	
	(b) All Other Loans	, , 000	, , 0.00	
	(c) TOTAL LOANS (add Lines 13(a) and (b))	, , , , ,	1,805,250.00	
14.	OFFSETS TO OPERATING		•	
	EXPENDITURES (Refunds, Rebates, etc.)	, , <i>U.O o</i>	, , 0.0 0	
15.	OTHER RECEIPTS (Dividends, Interest, etc.)	, , ooo	, , 000	
16.	TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)	, ,272.94	1,814,947.89	

DETAILED SUMMARY PAGE

FEC Form 3 (Revised 02/2003)

of Disbursements

Page 4

	II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17.	OPERATING EXPENDITURES	, 5,08900	1.\$51,002.90
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	, , , , , , , , , , , , , , , , , , ,	, 20,000.00
19.	LOAN REPAYMENTS: (a) Of Loans Made or Guaranteed by the Candidate	, , , 000	, , <i>0</i> 06
	(b) Of All Other Loans	, , 0.00	, , 0.00
20.	REFUNDS OF CONTRIBUTIONS TO: (a) Individuals/Persons Other Than Political Committees	Ann	, , 0.00
	(b) Political Party Committees(c) Other Political Committees (such as PACs)	, , , , , , , , , , , ,	, 0.00 , 0.00
	(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c))	, , 0.00	, , 0.00
21.	OTHER DISBURSEMENTS	, , , 0,00	, , 000
22.	TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21)	, 5,089.00	1,171,002.90
_	III. CASH S	UMMARY	
23.	CASH ON HAND AT BEGINNING OF REPO	DRTING PERIOD	,648,761.05
24	TOTAL RECEIPTS THIS PERIOD (from Line	e 16, page 3)	, ,272.94
25.	SUBTOTAL (add Line 23 and Line 24)		,649,033.99
26.	TOTAL DISBURSEMENTS THIS PERIOD (fi	rom Line 22)	, 5,089.00 ,643944.99
27.	CASH ON HAND AT CLOSE OF REPORTING (subtract Line 26 from Line 25)	NG PERIOD	643944.99
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FOR LINE NUMBER: PAGE SCHEDULE A (FEC Form 3) Use separate schedule(s) (check only one) for each category of the **ITEMIZED RECEIPTS** 11a 11b 11c 11d **Detailed Summary Page** Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) ALIONA Date of Receipt Mailing Address City Zip Code FEC ID number of contributing Amount of Each Receipt this Period federal political committee. Name of Employer Occupation Receipt For: **Election Cycle-to-Date Primary** General Other (specify) Full Name (Last, First, Middle Initial) Date of Receipt Mailing Address City State Zip Code FEC ID number of contributing Amount of Each Receipt this Period federal political committee. Occupation Name of Employer Receipt For: Election Cycle-to-Date General **Primary** Other (specify) Full Name (Last, First, Middle Initial) Date of Receipt Mailing Address City State Zip Code FEC ID number of contributing · Amount of Each Receipt this Period C federal political committee. Name of Employer Occupation Receipt For: Election Cycle-to-Date **Primary** General Other (specify) SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

SCHEDULE B (FEC Form 3) TEMIZED DISBURSEMENTS Any information copied from such Reports and Statements means for companying lawrences, other than using the name and		
or for commercial purposes, other than using the name and a NAME OF COMMITTEE (In Full) Finn For Severe		ອະ ເບ ຈບແລະ ເວກເກຍບແບກຮ Irom such commi nse.
Full Name (Last, First, Middle Initial) ** **Voicent Communication Mailing Address Tutterns T	•	Date of Disbursement 10 / 4 20 4 Amount of Each Disbursement this Period
Purpose of Disbursement Compute I CA Ton Sof7 Candidate Name GCOGE Sought: House Disbursement For Senate Primary President Other (s	Category, Type General	l l
Full Name (Last, First, Middle Initial) B. Logene Bryen Mailing Address 8323 Hickory Trans	Date of Disbursement	
Purpose en Disbursement Candidate Name Office Sought: House Disbursement For Senate President State: District:	Category, Type	
Full Name (Last, First, Middle Initial) C. Fell Ex Mailing Address Poplar Avenue		Date of Disbursement
Purpose of Disbursement Express Postage Candidate Name	Category Type	· I
Office Sought: House Disbursement Formary	General	
SUBTOTAL of Disbursements This Page (optional)		
TOTAL This Period (last page this line number only)	***************************************	

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FOR LINE NUMBER: SCHEDULE B (FEC Form 3) Use separate schedule(s) (check only one) for each category of the ITEMIZED DISBURSEMENTS Z 17 19a 19b **Detailed Summary Page** Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (in Full) Date of Disbursement Mailing Address Zip Code City Amount of Each Disbursement this Period and and the second second second 39.50 Purpose of Disburser 00/ Candidate Name Category/ Type Office Sought: Disbursement For: House Primary General Senate President Other (specify) District: State: Full Name (Last, First, Middle Initial) Date of Disbursement Amount of Each Disbursement this Period 38018 1,500,00 001 Category/ Type Office Sought: House Disbursement For: Senate Primary General President Other (specify) State: Full Name (Last, First, Middle Initial) Date of Disbursement C. Mailing Address City Zip Code Amount of Each Disbursement this Period Purpose of Disbursement Candidate Name Category/ Type Office Sought: House Disbursement For: Senate **Primary** General Other (specify) President State: District: SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

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SCHEDULE B (FEC Form 3) ITEMIZED DISRUBSEMENTS

FOR LINE NUMBER: (check only one) Use separate schedule(s) for each category of the

TEMIZED DISBONSEMENTS	Detailed Summary Page	17 18 19a 19b 20a 20b 20c 21
Any information copied from such Reports and Statements mor for commercial purposes, other than using the name and a	ay not be sold or used by any per address of any political committee	rson for the purpose of soliciting contributions
NAME OF COMMITTEE (In Full) Fling for Senate		
Full Name (Last, First, Middle Initial) A. Eugene Bryan Mailing Address Hickory Tra	Date of Disbursement	
City Or Lown State Purpose of Disbursement AND 819 M6 Candidate Name	Zip Code 38 0/ 8	Amount of Each Disbursement this Period
Office Sought: House Disbursement Formary President Other (st.)	General	
Full Name (Last, First, Middle Initial) B. NATIONAL ALL SE Mailing Address	WI SAYA CIOSEOUI	Date of Disbursement
City RIYA dh SA Purpose of Disbarsement Dand Fraul	Zip Code 58/2	Amount of Each Disbursement this Period , ,272,94
Candidate Name Candidate Name	General	Returded See Schedule "A"
Full Name (Last, First, Middle Initial) C. National Din SE Mailing Address 5542		Date of Disbursement
City ST. Louis State Ziger Ziger State Ziger State Ziger State Ziger State Ziger State Zig	p Code	Amount of Each Disbursement this Period
Office Sought: House Senate President State: Disbursement For Primary Other (s	General	See Above
SUBTOTAL of Disbursements This Page (optional)		
TOTAL This Period (last page this line number only)		an an ann an an an Air an Bhaile ann ann aigh a tha an an Bhaill an an an Air an

SCHEDULE C (FEC Form 3) LOANS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) 13a
NAME OF COMMITTEE (In Full) Finn For Sonate		
LOAN SOURCE Full Name (Last, First, Middle Initial)		ection: Primary General Other (specify)
City MenPhis TN 38	de ///	
Original Amount of Loan Cumulative Payment To	The second secon	Outstanding at Close of This Period
Date Incurred Date Due	Interest Rate	Secured: 9 0% (apr) Yes No
List All Endorsers or Guarantors (if any) to Loan Source 1. Full Name (Last, First, Middle Initial)	Name of Employer	
Mailing Address	Occupation	
Citý State ZIP Code	Amount Guaranteed Outstanding: 3	
2. Full Name (Last, First, Middle Initial)	Name of Employer	
Mailing Address	Occupation	
City State ZIP Code	Guaranteed	t west
3. Full Name (Last, First, Middle Initial)	Name of Employer	
Mailing Address	Occupation	
City State ZIP Code	Amount Guaranteed Outstanding:	11 (1) (1) (1) (1) (1) (1) (1) (
4. Full Name (Last, First, Middle Initial)	Name of Employer	
Mailing Address	Occupation	· · · · · · · · · · · · · · · · · · ·
City State ZIP Code	Amount Guaranteed Outstanding:	* * * * * * * * * * * * * * * * * * *
SUBTOTALS This Period This Page (optional) TOTALS This Period (last page in this line only)	•	gi i gi

15092705457

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

FURM 3		For An Aut	horized Cor	nmittee			Office Use Only
. NAME OF COMMITTEE (I		E OR PRINT		ixample: If typing wer the lines.	, type	12FE4M5	:
Elian	Fan Se	NATIC	 -	-1-1-1-1-1 -1		 	
						<u> </u>	<u></u>
DDRESS (number a	and street) LZ	76 Me	DUNT 1	Morriah	Roce	d	
▼ ¨∷ Check if c	lifferent		1111	-1-1-1-1-1-			
···· than previ reported (remPh.	سسىق		ا لب	IN Li	38/1/2-
FEC IDENTIF	ICATION NUMB	ER W	CITY ▲		S	TATE A	ZIP CODE A
	6168		3. IS THIS REPORT	X NEW (N)	OR :	AMENDE (A)	STATE V DISTRIC
TYPE OF R	EPORT (Choose	One)					
(a) Quarterly	Reports:	1 0	b) 12-Day PR	E-Election Repor	t tor the:	•	z •
April	15 Quarterly Repo	n (Q1)		Primary (12P)		General (12	G) Runoff (12R)
n e	5 Quarterty Repor			Convention (1	2C)	Special (12	3)
*. *,*	er 15 Quarterly Re	1	Election o		D D /	v v v v	in the State of
Janua	ry 31 Year-End Re	port (YE) (c) 30-Day PC	ST-Election Rep	ort for the:	 	
				General (30G)	٠.	Runoff (30R	Special (30S)
Termli	nation Report (TER	0	Election o		י ע ט	Y Y Y Y Y	in the State of
Covering Periodertify that I have upper or Print Name	examined this R	eport and to the LLUYD	ne best of my	knowledge and b		e, correct and	
ignature of Treasu		R.				u.u -	134 2013
	of false, erroneous	, or incomplete	information ma	y subject the pers	on signing the	nis Report to the	penalties of 52 U.S.C. §301
Office Use Only							FEC FORM 3 (Revised 02/2003)

FEC Form 3 (Revised 02/2003)

SUMMARY PAGE of Receipts and Disbursements

Page 2

Write or Type Committee Name

Hinn For SonaTe

Report Covering the Period:

From:

01 01 2015

To: 03 31 20

		-	OLUMN his Perio	· ·	COLUMN B Election Cycle-to-Date
6.	Net Contributions (other than loans)				
	(a) Total Contributions (other than loans) (from Line 11(e))		,	000	, 9,697.89
	(b) Total Contribution Refunds (from Line 20(d))	,	,	0.00	, , <i>coo</i>
	(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	3	,	000	, 9,697.89
7.	Net Operating Expenditures				
	(a) Total Operating Expenditures (from Line 17)	, .	- 1	000	1,151,002.90
	(b) Total Offsets to Operating Expenditures (from Line 14)	,	,	000	, , 0.00
	(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	,	7	000	1,151,00290
8.	Cash on Hand at Close of Reporting Period (from Line 27)	. ,		000	
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		J	000	
10.	Debts and Obligations Owed BY the Committee (Itemize all on	•	•		
	Schedule C and/or Schedule D)	5	,	0.00	

For further information contact:

Federal Election Commission 999 E Street, NW Washington, DC 20463

> Toll Free 800-424-9530 Local 202-694-1100

FE5AN018

DETAILED SUMMARY PAGE

of Receipts

Page 3

FEC Form 3 (Revised 12/2003)

Write or Type Committee Name

Fling For SeNATE

Report Covering the Period:

From:

To:

03 3% 7015

	I. RECEIPTS	COLUMN A Total This Period			COLUMN B Election Cycle-to-Date	
11.	CONTRIBUTIONS (other than loans) FROM:					
	(a) Individuals/Persons Other Than			_		
	Political Committees (i) Itemized (use Schedule A)	y	,	000	.	7272.94
	(ii) Uniternized(iii) TOTAL of contributions	,	, ,	000	,	242495
	from individuals	7	•	0.00	,	9697.89
	(b) Political Party Committees	, J		0.00	, , , ,	, 000
	(such as PACs)	,	,	0.00	3 .	, 000
	(d) The Candidate	3 (,	0.0.0	. •	, 0.06
	(add Lines 11(a)(iii), (b), (c), and (d))	,	. •	0.00	, .	9.697.89
12.	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		•	000	• •	, 0.00
13.	LOANS:			_		
	(a) Made or Guaranteed by the Candidate	,	,	000	1,80	5,250.00
	(b) All Other Loans(c) TOTAL LOANS	•	5 .	000	,	, 000
	(add Lines 13(a) and (b))	,	, ,	000	1,80	5,250.00
14.	OFFSETS TO OPERATING EXPENDITURES					
	(Refunds, Rebates, etc.)	. 1	y .	000	,	, 000
15.	OTHER RECEIPTS (Dividends, Interest, etc.)	,		0.00		, 0.00
16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)		, , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , ,	0.00	181	4,947.89

DETAILED SUMMARY PAGE

FEC Form 3 (Revised 02/2003) of Disbursements Page 4

	II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17.	OPERATING EXPENDITURES	, , 000	1,151,002.90
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	, 000	, 20,000.00
19.	LOAN REPAYMENTS: (a) Of Loans Made or Guaranteed by the Candidate	,643,944.99	,643,944.99
	(b) Of All Other Loans	, 0.00 , 643,944.99	,64394499
20.	REFUNDS OF CONTRIBUTIONS TO: (a) Individuals/Persons Other Than Political Committees	, , 000 , , 000	, , 0.00
	(c) Other Political Committees (such as PACs)	, , 006	, , coo
21.	OTHER DISBURSEMENTS	, , , , , ,	, , 000
22.	TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21)	,643,944.99	1.814.947.89
_	III. CASH S	UMMARY	
23.	CASH ON HAND AT BEGINNING OF REPO	DRTING PERIOD	, 643, 944.99
24	TOTAL RECEIPTS THIS PERIOD (from Line	16, page 3)	, , 0.00
25.	SUBTOTAL (add Line 23 and Line 24)		,64394499 ,643,944.99
26.	TOTAL DISBURSEMENTS THIS PERIOD (fr	om Line 22)	.643,944.99
27.	CASH ON HAND AT CLOSE OF REPORTING (subtract Line 26 from Line 25)	NG PERIOD	, , 0.00

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SCHEDULE B (FEC Form 3) TEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	Check only one)			
Any information copied from such Reports and Statements m or for commercial purposes, other than using the name and a		person for the purpose of soliciting contributions			
NAME OF COMMITTEE (In Full) Flinn For Sonat	e				
Full Name (Last, First, Middle Initial) George S. Finn Mailing Address City MemPhis State The Purpose of Disbursement Oan RePayment Candidate Name George Finn Office Sought: House Disbursement For Senate President Other (s	Zip Code Zip Code Category Type General	,0,0,7,7,7,2,7			
State: District: Full Name (Last, First, Middle Initial) B.		Date of Disbursement			
Mailing Address					
City State	City State Zip Code				
Purpose of Disbursement		The second section of the second seco			
Candidate Name	Category Type				
Office Sought: House Disbursement For Senate Primary Other (s	General				
Full Name (Last, First, Middle Initial)					
c.		Date of Disbursement			
Malling Address					
City State Zi	p Code	Amount of Each Disbursement this Period			
Purpose of Disbursement	,				
Candidate Name	Categor				
Office Sought: House Disbursement For Senate Primary President Other (s	General				
SUSTOTAL of Disbursements This Page (optional)					
TOTAL This Period (last page this line number only)					

CHEDULE C (FEC Form 3) DANS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) 13a
ME OF COMMITTEE (In Full) Fling For So	NATE		,
LOAN SOURCE Full Name (Last, First, No. 18 18 18 18 18 18 18 18 18 18 18 18 18	s. Jn.	·	lection: Primary General Other (specify) ▼
City MemPh; 5 Original Amount of Loan	State ZIP Cod	8-111	e Outstanding at Close of This Perio
1,805,250.00			
TERMS Date Incurred		Interest Rate	Secured: O 0 % (apr) Yes No
List All Endorsers or Guarantors (if any) 1. Full Name (Last, First, Middle Initial)	to Loan Source	Name of Employer	
1. Full Name (Last, First, Middle Milial)		Name of Employer	
Mailing Address		Occupation	
City State	ZIP Code	Guaranteed	* * * * * * * * * * * * * * * * * * * *
2. Full Name (Last, First, Middle Initial)		Name of Employer	
Mailing Address		Occupation	
City State	ZIP Code	Amount Guaranteed Outstanding:	•
3. Full Name (Last, First, Middle Initial)		Name of Employer	
Mailing Address		Occupation	
City State	ZIP Code	Amount Guaranteed Outstanding:	,
4. Full Name (Last, First, Middle Initial)		Name of Employer	
Malling Address		Occupation	
City State	ZIP Code	Amount Guaranteed Outstanding:	,
UBTOTALS This Period This Page (optional		·	.9

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

THE FLINN CLINIC

DIAGNOSTIC ULTRASOUND CONSULTANTS. P.C. CENTER OF EXCELLENCE FOR ULTRASOUND AND MAMMOGRAPHY GEORGE S. FLINN, JR., M.D. 1325 EAGTMORELAND, GLITTE 545 MEMPHIS, TEXXEESEE 38104 801-516-8970 FAX 801-516-8973

Page I of I

Subt

2014 US Senate Loan Forgiveness

Date:

4/14/2015 4:58:04 P.M. Central Day ant Time

From: To:

CHEO CON COM

מוסט בפריון וב בייותם

The lean of \$1,161,305.01 to the 2014 US Senate Campaign (Flinn For Senate) is hereby forgiven.

FEC FORM 3Z (File with Form 3)

CONSOLIDATION REPORT OF RECEIPTS AND DISBURSEMENTS

(To Be Used By A Principal Campaign Committee)

Na	lame of Principal Campaign Committee (In Full) Report Covering Period:							
	From:							
/	Flinn For Senate 01 01 2015 03 31 2015							
	(a) (b) Line No. 11(a) Line No. 11(b) Total Contributions From Indiv/Persons Other Than Political Committees (a) (b) Line No. 11(b) Total Contributions From Political Party Political Committees Committees							
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в	C	olumn Total Last Page O	nly	·····		727294	O	
		(c) Line No. 11(c) Total Contributions From Other Political Committees	(d) Line No. 11(d) Total Contributions From The Candidate	(e) Line No. 11(e) Total Contributions	(f) Line No. 12 Total Transfers From Other Authorized Committees	(g) Line No. 13(a) Total Loans Made or Guaranteed by the Candidate	(h) Line No. 13(b) Total Ali Other Loans	
	A	0	0	0	0	ð	0	
	В	J	0	9697.89	0	1,805,250.00	0	
		(i) Line No. 13(c) Total Loans	(i) Line No. 14 Total Offsets to Operating Expenditures	(k) Line No. 15 Total Other Receipts	(i) Line No. 16 Total Receipts	(m) Line No. 17 Total Operating Expenditures	(n) Line No. 18 Total Transfers to Other Authorized Committees	
	Δ	0	0	0	0	0	. 0	
	В	1,805.250.00	0	O	1.84,947.89	1,814,997.89	20,000.00	
		Line No. 19(a) Line No. 19(a) Total Loan Repayments of Loans Made or Guaranteed by The Can- didate	(p) Line No. 19(b) Total Loan Repayments of All Other Loans	(q) Line No. 19(c) Total Loan Repayments	(r) Line No. 20(a) Total Contribution Refunds to Individuals/Persons	(s) Line No. 20(b) Total Contribution Refunds to Political Party Committees	(t) Line No. 20(c) Total Contribution Refunds to Other Political Committees	
	A	643,944.99		643,844.99	0	. 0	0	
	в	643,94499	O	643.944.99	ව	\mathcal{O}	Ō	
		(u) Line No. 20(d) Total Contribution Refunds	(v) Line No. 21 Total Other Disbursements	(w) Line No. 22 Total Disbursements	(x) Line No. 23 Cash on Hand Beginning of Reporting Period	(y) Line No. 27 Cash on Hand Close of Reporting Period	(z) Line No. 9 Debts & Obligations Owed TO the Committee	
	Α	0	Ø	643.944.99	•	\mathcal{O}	0	
	В	O)	O	1,814,947.89	643-944.99	0	0	
		(aa) Line No. 10 Debts & Obligations Owed BY the Committee	(bb) Line No. 6(c) Net Contributions	(cc) Line No. 7(c) Net Operating Expenditures				
	A	0	9697.59	1,151,0029	•			
	В	0	9697,59	1,151,002.90	,			

THE FLINN CLINIC

DIAGNOSTIC ULTRASOUND CONSULTANTS, P.C.

CENTER OF EXCELLENCE FOR ULTRASOUND AND MAMMOGRAPHY

GEORGE S. FLINN, JR., M.D.

1325 EASTMORELAND, SUITE 545

MEMPHIS, TENNESSEE 38104

901-516-8970 FAX 901-516-8973

Page 1 of 1

Subj:

2014 US Senate Loan Forgiveness

Date:

4/14/2015 4:56:04 P.M. Central Daylight Time

From:

WHBO Check com

The loan of \$1,161,305.01 to the 2014 US Senate Campaign (Flinn For Senate) is hereby forgiven.

Thank you.

Stage Flain

George Flinn



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 1, 2015

Lloyd Hetzer, Treasurer Flinn for Senate 776 Mount Moriah Road Memphis, TN 38117

C00561688 AF#: 2969

Dear Mr. Hetzer:

On April 30, 2015, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for Flinn for Senate and you, in your official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

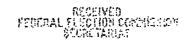
Sincerely,

Rhiannon Magruder Reviewing Officer

Office of Administrative Review

KMannon Magnider





2015 JUN 25 PM 3: 44

SENSITIVE

June 25, 2015

MEMORANDUM

To:

The Commission

Through:

Alec Palmer

Staff Director

From:

Patricia C. Orrock

Chief Compliance Officer

Rhiannon Magruder Q\(\sigma^{\chi}\)

Reviewing Officer

Office of Administrative Review

Subject:

AF# 2969 - Flinn for Senate and Lloyd Hetzer, in his official capacity as

Treasurer (C00561688)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation. After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment



June 25, 2015

REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW ("OAR")

AF# 2969 - Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer (C00561688)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$330 civil money penalty.

Reason-to-Believe Background

The 2014 Year-End Report was due on January 31, 2015. The respondents filed the report on April 30, 2015, 89 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 3, 2015, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2014 Year-End Report and made a preliminary determination that the civil money penalty was \$13,200 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on April 6, 2015 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending December 31 no later than January 31 of the following calendar year. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate. 52 U.S.C. § 30102(g) and 11 C.F.R. § 105.2. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed. 52 U.S.C. § 30104(a)(5), and 11 C.F.R. §§ 100.19 and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Respondents' Challenge

On April 30, 2015, the Commission received the written response ("challenge") from the Candidate stating their records indicate the 2014 Year-End Report was timely filed. The challenge included an affidavit of campaign staff member, Eugene S. Bryan. The affidavit states the report was timely prepared and mailed to the Secretary of the Senate via U.S.P.S. First-Class Mail on January 15, 2015. Mr. Bryan further explains:

"The report was sent First Class Postage because there was sufficient time for delivery, 16 days before the deadline. The package was not returned to the Flinn for Senate Committee, and was therefore believed to have been received in a timely manner."

The respondents conclude by stating their non-compliance was not intentional, and they have timely completed all other filings and necessary amendments. The challenge includes an amended version of the 2014 Year-End Report covering October 1 through December 31, 2014 and a Termination Report covering January 1 through March 31, 2015.

Analysis

The respondents state the 2014 Year-End Report was mailed via U.S.P.S First-Class Mail to the Secretary of the Senate on January 15, 2015, well before the January 31, 2015 filing deadline. The respondents also state that since the package was not returned to the Committee, they believed the report was received at the Secretary of the Senate. However, Commission records indicate this mailing was never received, and due to the absence of tracking data for First-Class Mail services, no details are available to further explain the potentially lost package.

The Commission first notified the respondents of their failure to file the report on February 19, 2015, when RAD sent a non-filer notice to the Committee's address of record. On February 24, 2015, Mr. Eugene S. Bryan called the RAD Compliance Analyst regarding that notice. Mr. Bryan indicated that he thought the report was timely mailed, and he would check into the issue further. The Committee did not contact the Commission again until April 7, 2015, after it received the RTB letter. On April 30, 2015, 89 days after the filing deadline and 23 days after last speaking with RAD, the Committee filed the Amended 2014 Year-End Report with the Secretary of the Senate.

The Commission's Campaign Guide for Congressional Candidates and Committees ("Campaign Guide") explains how the Commission and the Secretary of the Senate determine filing dates based on mailing method. Page 82 states:

"If a statement or report is sent by registered mail, certified mail or overnight mail with an online tracking system, it is considered filed on the date of the U.S. postmark...100.19. The committee should retain evidence that it delivered the report to the U.S. Postal Service or the overnight delivery service, in the event of a delivery failure...

"...If a statement or report is sent by first class mail, it is considered filed on the date it is received by the Secretary of the Senate... 100.19(b)(2) and 104.5(e). The risk of timely delivery is on the filer." (emphasis added)

Despite the respondents' contentions that the Committee timely mailed the 2014 Year-End Report, there is no evidence to suggest the Secretary of the Senate received the report prior to the April 30, 2015 filing. Their challenge fails to address any of the three valid grounds at 11 C.F.R § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 104.14(d). Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

At the time of the RTB finding, the Commission used an estimated level of activity (\$993,529) to calculate the fine because the report had not yet been filed. 11 C.F.R § 111.43(d)(2)(i). The respondents' Amended 2014 Year-End Report discloses \$272 in total receipts and \$5,089 in total disbursements, resulting in an actual level of activity of \$5,361. Using the schedule of penalties at 11 C.F.R § 111.43(a), for respondents with no previous violations, and the level of activity bracket of \$5,000 - \$9,999.99, the civil money penalty is \$330 x [1 + (.25 x 0 previous penalties)] or \$330. Therefore, the Reviewing Officer recommends that the Commission assess a \$330 civil money penalty, reduced from the RTB civil money penalty of \$13,200.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 2969 that Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 2969 that Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$330 civil money penalty (reduced from the RTB civil money penalty of \$13,200); and
- 3. Send the appropriate letter.

Attachments

Attachment 1 -

Attachment 2 - Page 82 of Campaign Guide for Congressional Candidates and Committees

Attachment 3 – Declaration from RAD

Attachment 4 – Declaration from OAR

For information on when to report last-minute contributions received as part of a joint fundraising transfer, see Appendix C, Section 13.

Special Elections

Filing dates for special elections are published on the FEC's website, in the FEC Record and in the Federal Register. The Commission also notifies the principal campaign committees of candidates who are on the ballot in a special election. If a regularly scheduled report is due within 10 days of the date a special election report is due, the Commission may waive the regular report. 104.5(h).

Meeting the Filing Deadline

By Registered Mail, Certified Mail, Priority Mail with Delivery Confirmation, Express Mail with Delivery Confirmation or Overnight Delivery

If a statement or report is sent by registered mail, certified mail or overnight mail with an online tracking system,⁴ it is considered filed on the date of the U.S. postmark. (Note the special rule for pre-election reports, above.) 100,19. The committee should retain evidence that it delivered the report to the U.S. Postal Service or the overnight delivery service, in the event of a delivery failure.

By First Class Mail

If a statement or report is sent by first class mail, it is considered filed on the date it is received by the Secretary of the Senate or the Federal Election Commission. 100.19(b)(2) and 104.5(e). The risk of timely delivery is on the filer.

By Electronic Filing

An electronic report is considered "filed" when it is received and validated by the Commission's computer system on or before 11:59 p.m. (Eastern Time) on the filing date. Incomplete or inaccurate reports that do not pass the FEC's validation program will not be considered filed. The Commission will notify the filer that the report has not been accepted. 100.19(c) and 104.18(e)(2).

By CD

While most electronic filers find it more convenient to file through the Internet, the Commission also accepts properly-formatted electronic reports on CDs either hand delivered or sent by other delivery means, such as the U.S. Postal Service. It is important to note that all mail sent to the FEC through the U.S. Postal Service undergoes special processing which might damage the information on a CD. For specific instructions on how to file electronically using a CD, see the Electronic Filing section of the FEC website at http://go.usa.gov/8hUA.

Mandatory Electronic Filing

Some committees must file electronically (See Section 5, "Electronic Filing"). If a committee required to file electronically files a paper report instead of an electronic report, the report will be considered not filed. The committee may be subject to the Commission's enforcement process for nonfilers and may have its name published as a nonfiler. See 104.18(a)(2).

4. ADMINISTRATIVE FINES FOR LATE FILERS AND NONFILERS

The Administrative Fines Program, which is based on amendments to the Federal Election Campaign Act, 5 assesses civil money penalties for violations involving:

- Failure to file reports on time:
- Failure to file reports at all;
- Failure to file 48-hour notices.

If the Commission finds "reason to believe" (RTB) that a committee violated the law, the Commission will notify the committee in writing of its finding and the amount of the civil money penalty. I I 1.32. The committee will have 40 days to either pay the civil money penalty or submit a written challenge to the Commission action. If the committee challenges the finding, it will be reviewed by an independent reviewing officer who was not involved in the RTB finding. After the Commission considers the re-

⁴ Overnight mail is often used to refer to priority mail having a delivery confirmation, express mail having a delivery confirmation, or an overnight delivery service with an online tracking system.

⁵ Pub. L. No. 106-58, 106th Cong., § 640, 113 Stat. 430, 476-77 (1999); Commission authority extended in Pub. L. No. 106-67, 107th Cong., § 642, 115 Stat. 514, 555 (2001); In Pub. L. No. 108-199, 108th Cong., § 639, 118 Stat 3 (2004); in Pub. L. No. 109-115, § 721, 119 Stat. 2396, 2493-2494 (2006); and in Pub. L. No. 113-72, § 721, 119 Stat. 2396, 2493-2494 (2013).

DECLARATION OF KRISTIN D. ROSER

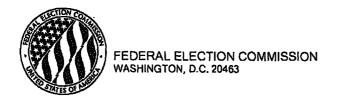
- 1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
- 2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Flinn for Senate:
 - A) Non-Filer Letter, dated February 19, 2015, referencing the 2014 Year-End Report (sent via regular mail to the address of record);
 - B) Reason-to-Believe Letter, dated April 6, 2015, referencing the 2014 Year-End Report (sent via overnight mail to the address of record).
- I hereby certify that I have searched the Commission's public records and confirmed with the Secretary of the Senate Office of Public Records that Flinn for Senate did not file the 2014 Year-End Report until April 30, 2015 with the Commission.
- 4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 25th day of June, 2015.

Kristin D. Roser

Chief, Compliance Branch Reports Analysis Division

Kristin W. Roses

Federal Election Commission



RQ-7

February 19, 2015

LLOYD HETZER, TREASURER FLINN FOR SENATE 776 MOUNT MORIAH ROAD MEMPHIS, TN 38117

IDENTIFICATION NUMBER: C00561688

REFERENCE: YEAR-END REPORT (10/01/2014 - 12/31/2014)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a) (formerly 2 U.S.C. §434(a))

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

FLINN FOR SENATE

Page 2 of 2

If you have any questions regarding this matter, please contact David Garr at our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

Sincerely,

Oebbie Chacona

Deborah Chacona Assistant Staff Director Reports Analysis Division

250

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The principal campaign committee of a candidate must file a report for the quarter ending December 31 no later than January 31 of the following calendar year. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited on the filing date to be timely filed. Reports sent by first class mail must be received by the close of business on the filing date to be timely filed. All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate.
- 3) It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
- 4) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page, Summary Page, Detailed Summary Pages, and Secretary of Senate Envelope Replacement Page of the 2014 Year-End Report filed by Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer. According to the Commission's records, the document was received on April 30, 2015 and covers the period of October 1 through December 31, 2014.
- 5) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 25th day of June, 2015.

Rhiannon Magruder Reviewing Officer

Office of Administrative Review Federal Election Commission

annon Maguden

15020165017

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

SECRETARY OF THE SENATE

15 MAY -4 PH 1: 18

FORM 3 For An Authorized Committee				Office Use Only		
1. NAME OF COMMITTEE (in fi	TYPE OR PRINT		ample: If typing, type er the lines.	12FE4M5		
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ADDRESS (number and Check if differentian previous reported. (AC) FEC IDENTIFICA	rent Manch				2//_27- ZIP CODE 4	
7-7-7-7-	6/688	3. IS THIS REPORT	NEW (N) OR	AMENDED (A)	STATE V D	DISTRICT
(a) Quarterly Rep April 15 (July 15 (October 1 January 3	ORT (Choose One) ports: Quarterly Report (Q1) Quarterly Report (Q2) 15 Quarterly Report (Q3) 31 Year-End Report (YE) on Report (TER)	Election on	-Election Report for the Primary (12P) Convention (12C) M M / D D T-Election Report for the General (30G)	General (12G) Special (12S)	in the State of	ff (12R)
5. Covering Period	Zð' &7'	2014	through 2	3 '52'[2	614	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. Type or Print Name of Treasurer Signature of Treasurer Date Date NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.						
Office Use Only				, , ,	FEC FORM (Revised 02/2003)	-

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	•	FEC Form 3 (Revised 02/2003)	SUMMARY PAGE of Receipts and Disbursements	Page 2		
W	Write or Type Committee Name Hinn For SanaTe					
R	s port	Covering the Period: From:	Za'ei'aeiy	o: [,] (3) (20/4)		
	Net	Contributions (other than I and	COLUMN A This Period	COLUMN B Election Cycle-to-Date		
6.	Net	Contributions (other than loans)				
	(a)	Total Contributions (other than loans) (from Line 11(e))	27399	9627.89		
	(b)	Total Contribution Refunds (from Line 20(d))				
	(c)	Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	272.24	962789		
7.	Net	Operating Expenditures				
	(a)	Total Operating Expenditures (from Line 17)	[,5,0.8.9.00]	1. 1. 1. 00 2.90		
	(b)	Total Offsets to Operating Expenditures (from Line 14)				
	(c)	Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	5089.00	1.1.5.1.0029.0		
8.		sh on Hand at Close of porting Period (from Line 27)	643,944.9.9			
9.	the	ots and Obligations Owed TO Committee (Itemize all on nedule C and/or Schedule D)	L			
10.	the	ots and Obligations Owed BY Committee (Itemize all on nedule C and/or Schedule D)	1,805,250.00			
			For further information contact:			
			Federal Election Commission 999 E Street, NW Washington, DC 20463			
			Toll Free 800-424-9530 Local 202-694-1100			

FESAN018

R	aporl	Flinn For S	CO'CI' GOLY	: <u>[] </u>
		I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11.	CO	NTRIBUTIONS (other than loans) FROM:		
	(a)	Individuals/Persons Other Than Political Committees (i) Itemized (use Schedule A)	27294	7,222.5
		(ii) Uniternized	272.94	2424
		Political Party Committees Other Political Committees (such as PACs)		
		The Candidate TOTAL CONTRIBUTIONS (other than toans) (add Lines 11(a)(iii), (b), (c), and (d))	27290	96978
12.		ANSFERS FROM OTHER THORIZED COMMITTEES		
13.	(a)	Candidate		1,805,250.
	(c)	All Other Loans TOTAL LOANS (add Lines 13(a) and (b))		1.805.250
14.	EX	FSETS TO OPERATING PENDITURES funds, Rebates, etc.)		
15.		HER RECEIPTS	[ao.2	
16.	116	TAL RECEIPTS (add Lines e), 12, 13(c), 14, and 15) my Total to Line 24, page 4)		<u> </u>

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

Page 4

	FEC FORM 3 (Neviseo 02/2003)		rage 4
	II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17.	: OPERATING EXPENDITURES	5,0.89.00	15.1,00.2.90
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0.0.0	20,000.00
19.	LOAN REPAYMENTS: (a) Of Loans Made or Guaranteed by the Candidate	c.o.o	C.O.6
	(b) Of All Other Loans(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b))	0.0.0	
20.	REFUNDS OF CONTRIBUTIONS TO: (a) Individuals/Persons Other Than Political Committees	[
	(b) Political Party Committees (c) Other Political Committees (such as PACs)		
	(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c))	0.00	0.00
21.	OTHER DISBURSEMENTS	000	
22.	TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21)	5,08900	1.1.7.1.002.90
	III. CASH S	UMMARY	
23.	CASH ON HAND AT BEGINNING OF REPO	PATING PERIOD	648,761.05
24 TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)			27.2.94
25. SUBTOTAL (add Line 23 and Line 24)			649.033.99
26.	TOTAL DISBURSEMENTS THIS PERIOD (fr	om Line 22)	5,08.900
27.	CASH ON HAND AT CLOSE OF REPORTING (subtract Line 26 from Line 25)	NG PERIOD	64394499

15092705460

Dana K. Maccallum Superintendent Hart Senate Office Building Suite 132 Washington, OC 20510-7116 Phone (202) 220-0372

2/28/2015

United States Senate office of the secretary

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:
HAND DELIVEREDDate of Receipt
USPS FIRST CLASS MAIL Date of Receipt Postmark
USPS REGISTERED/CERTIFIED
USPS PRIORITY MAIL
DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL
USPS EXPRESS MAILPostmark
OVERNIGHT DELIVERY SERVICE:
FEDERAL EXPRESS SUPPLING DATE NEXT BUSINESS DAY DELIVERY
UPS DHL
AIRBORNE EXPRESS
RECEIVED FROM FEDERAL ELECTION COMMISSION
POSTMARK ILLEGIBLE POSTMARK
FAX
Date of Receipt OTHER
PREPARER DATE PREPARED 5



June 25, 2015

11.4

Lloyd Hetzer, Treasurer Flinn for Senate 776 Mount Moriah Road Memphis, TN 38117

C00561688 AF#: 2969

Dear Mr. Hetzer:

On April 3, 2015, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Flinn for Senate and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to file the 2014 Year-End Report. The Commission also made a preliminary determination that the civil money penalty was \$13,200 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Rhiannon Magruder Reviewing Officer

Office of Administrative Review

Khannon Magnider

SENSITIVE



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

PECTUAL SECTION OF SERVICE

2015 JUL 14 PM 1: 33

July 14, 2015

MEMORANDUM

To:

The Commission

Through:

Alec Palmer Gwk

Staff Director

From:

Patricia C. Orrock 4

Chief Compliance Officer

Rhiannon Magruder

Reviewing Officer

Office of Administrative Review

Subject:

Final Determination Recommendation in AF# 2969 - Flinn for Senate and Lloyd

Hetzer, in his official capacity as Treasurer (C00561688)

On April 3, 2015, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2014 Year-End Report and made a preliminary determination that the civil money penalty was \$13,200 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 30, 2015, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated June 25, 2015 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$330 civil money penalty, reduced from the RTB civil money penalty of \$13,200.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 2969 involving Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 2969 that Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$330 civil money penalty (reduced from the RTB civil money penalty of \$13,200); and
- 3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Final Determination Recommendation:)	AF 2969
Flinn for Senate and Lloyd Hetzer, in his)	
official capacity as Treasurer)	
(C00561688))	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 23, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2969:

- 1. Adopt the Reviewing Officer recommendation for AF# 2969 involving Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer in making the final determination.
- 2. Make a final determination in AF# 2969 that Flinn for Senate and Lloyd Hetzer, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$330 civil money penalty (reduced from the RTB civil money penalty of \$13,200).
- 3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

Shawn Woodhead Werth

Secretary and Clerk of the Commission



July 24, 2015

Lloyd Hetzer, Treasurer Flinn for Senate 776 Mount Moriah Road Memphis, TN 38117

C00561688 AF#: 2969

Dear Mr. Hetzer:

On April 3, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Flinn for Senate and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2014 Year-End Report. By letter dated April 6, 2015, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$13,200 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 30, 2015, the Office of Administrative Review received your written response, challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that Flinn for Senate and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on the 2014 Year-End Report filed April 30, 2015 (\$5,361), assess a civil money penalty in the amount of \$330 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Reviewing Officer Recommendation, a copy of which was sent to you on June 25, 2015.

On July 23, 2015, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Flinn for Senate and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and based on the level of activity disclosed on the 2014 Year-End Report (\$5,361), assessed a civil money penalty in the amount of \$330 (reduced from the RTB civil money penalty of \$13,200). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Ann M. Ravel Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$330 for the 2014 Year-End Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission PO Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox FEC # 979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Flinn for Senate

FEC ID#: C00561688

AF#: 2969

PAYMENT AMOUNT DUE: \$330



FEDERAL ELECTION COMMISSION Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2969

DATE SCANNED 8/19/10

SCANNER NO. 2

SCAN OPERATOR 54